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8 JAMES I. STANG, ESQ. (CA BAR 94435)  
9 JOHN D. FIERO, ESQ. (CA BAR. 136557)  
10 PACHULSKI, STANG, ZIEHL, YOUNG,  
11 JONES & WEINTRAUB P.C.  
12 10100 Santa Monica Boulevard, 11<sup>th</sup> Floor  
13 Los Angeles, California 90067  
14 Telephone: (310) 277-6910  
15 Facsimile: (310) 201-0760

16 Counsel for COMMITTEE OF TORT LITIGANTS

17 **UNITED STATES BANKRUPTCY COURT**  
18 **EASTERN DISTRICT OF WASHINGTON**

19 In re:

20 **THE CATHOLIC BISHOP OF**  
21 **SPOKANE a/k/a THE CATHOLIC**  
22 **DIOCESE OF SPOKANE**

23 **COMMITTEE OF TORT LITIGANTS,**

24 **Plaintiff,**

25 **v.**

26 **THE CATHOLIC BISHOP OF**  
27 **SPOKANE, et al.,**

28 **Defendants.**

Case No.: 04-08822-PCW11

Chapter 11

Adv. Case No. 05-80038

**AFFIDAVIT OF JAMES I.**  
**STANG, ESQ. IN SUPPORT OF**  
**COMMITTEE OF TORT**  
**LITIGANTS' REPLY**  
**MEMORANDUM OF**  
**AUTHORITIES**

1 James I. Stang, being duly sworn, deposes and says:

2  
3 1. I am an attorney at law duly authorized to practice before all of the courts  
4 for the State of California. I have also been admitted pro hac vice to appear in the  
5 above-captioned adversary proceeding. I am a shareholder in the law firm of  
6 Pachulski, Stang, Ziehl, Young, Jones & Weintraub P.C. ("PSZYJW"), counsel to the  
7 Committee of Tort Litigants (the "Committee") in the instant matter. I make this  
8 affidavit in support of the Committee of Tort Litigants' Reply Memorandum Of  
9 Authorities in Response to Oppositions and Cross Motion for Summary Judgment  
10 (Diocese Opposition and Cross Motion Docket Nos. 200 and 203 and Exemplar of  
11 Parish Opposition at Docket No. 128) (the "Reply"), filed concurrently herewith. I  
12 make this Affidavit based on personal knowledge. If called as a witness, I would and  
13 could testify competently as to the matters contained herein.

14 2. Almost every affidavit submitted by the priest at a given parish includes  
15 one or more invoices for insurance. The insurance policies enumerated in the invoices  
16 include Policies 8434 (General Liability and Commercial Property) and XL 8434  
17 (Umbrella Policy) written by the Catholic Mutual Relief Society. The Committee  
18 obtained copies of the referenced policies from Timothy Kosnoff, state court counsel  
19 for many of the plaintiffs in the prepetition state court litigation who obtained them  
20 from the Diocese. Policy 8434 states that the certificate holder is the Catholic Bishop  
21 of Spokane, A corporation Sole. There is no reference to the Parishes as certificate  
22 holders or beneficiaries. A true and correct copy of the face pages of the Policy 8434  
23 is attached hereto as Exhibit 1.

24 3. In responses to interrogatories propounded in *Corrigan v. Catholic*  
25 *Bishop of Spokane*, Spokane County Superior Court Case No. 02-2-05956-7, the  
26 Diocese stated that the Catholic Bishop of Spokane was the insured in various  
27 insurance property and liability policies. A true and correct copy of the interrogatory  
28 response is attached hereto as Exhibit 2.

ESPOSITO, GEORGE, & CAMPBELL, P.L.L.C.  
421 W. Riverside Avenue, Suite 960  
Spokane, WA 99201-0407  
Phone: (509) 624-9219 Fax: (509) 624-9231

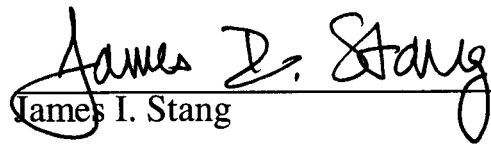
18477-002\DOCS\_LA:141110.2

STANG AFFIDAVIT IN SUPPORT OF COMMITTEE OF TORT

1           4.     Attached hereto as Exhibit 3 is a true and correct copy of the "Brief Of  
2 Respondent Catholic Bishop of Spokane", filed in Munns v. Martin, Supreme Court of  
3 Washington, Case No. 63837-3.

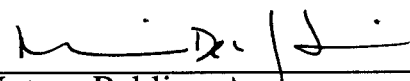
4           5.     I caused First American Title Insurance Company to obtain a copy of the  
5 Statutory Warranty Deed for the real property referenced in the declaration of Father  
6 Mangan (St. Joseph's-Otis Orchards Parish). A true and correct copy of the deed is  
7 attached hereto as Exhibit 4.

8 Dated: June 13, 2005

9  
10   
James I. Stang

11 State of California )  
12 County of Los Angeles )

13 Subscribed and sworn to (or affirmed) before me on  
14 this 13th day of June, 2005 by James I. Stang,  
15 personally known to me or proved to me on the basis  
of satisfactory evidence to be the person(s) who  
appeared before me.

16   
17 Notary Public  
My Commission Expires: [11/27/05]



# Catholic Mutual Relief Society of America

## Declarations

Certificate Holder: **The Catholic Bishop of Spokane, A Corporation Sole**  
 Address: **P. O. Box 1453** Charges Due at Inception: **\$323,603.00**  
**Spokane, WA 99210** Business of Certificate Holder  
**Catholic Diocese**

Certificate Period From: **February 1, 1998** To: **February 1, 1999**  
**Noon Standard Time** **Noon Standard Time**

Coverage is provided in accordance with the following schedule of coverages. No coverage is provided for any part of this certificate unless a limit of liability or the word "Included" is shown for such coverage section or part.

Section I-Property	Limit of Coverage/Liability	Deductible
A. & B. Building and Personal Property*		\$2,500 Per Location
C. Loss of Income*(Not to exceed 12 mos.)	4,400,000	
Earthquake Damage**	4,000,000	5% (See Page 11)
**Each Parish or if not a Parish each Location		
*Coverage is limited per building/contents or loss of income to the amount shown on the attached ledger page(s).		
Section II-Liability	\$500,000	
Certificate Limit of Liability	except as indicated below	
Limit(s) shown for the following is the maximum we will pay per occurrence/aggregate under the coverage part:		
D. Bodily Injury, Property Damage, Personal Injury, Advertising Injury, Corporal Punishment	500,000	
E. Fire Legal Liability	500,000	
F. Medical Payments to Others	5,000	
G. Cemetery Errors & Omissions	500,000	
H. Counseling Errors & Omissions	500,000	
I. Sexual Misconduct - See Endt. for Retroactive Dates	850,000 Annual Aggregate	
Paragraph 5(b) Notice Date is 2-1-98		
J. Employee Benefits Errors & Omissions	500,000	
K. Employment Practices Liability	100,000 Annual Aggregate	20% Certificate Holder Participation
Optional:		
Incidental Malpractice/Nursing Home/Professional Liability	500,000	
Liquor Liability (Limited)	500,000	
Excess Auto Liability - PKS 104-2(1-96)	150,000	
Excess Employers Liability - Form PKS-103-2(1-89)	400,000	
Section III-Crime Coverage	\$100,000	
Certificate Limit of Liability		
Employee Dishonesty-Agreement I (Blanket)	100,000	\$2,500
Theft-Agreement II-Money & Securities	100,000	\$2,500 Per Act
Depositors Forgery-Agreement III	100,000	\$2,500
(Including Counterfeit Money)		

PKS-101(1-98)

Page 1

**Catholic Bishop**  
**RFP 1072**

### Forms and Endorsements Applicable PKS-113-1

Page 2

**Catholic Bishop**  
**RFP 1073**

1  
2  
3  
4  
5  
6  
7  
8  
9 SUPERIOR COURT, STATE OF WASHINGTON, COUNTY OF SPOKANE

10 MICHAEL CORRIGAN, RC, MM, DE, RH,  
11 JB, JW, MN, JS and CC individually and as  
12 personal representative of the Estate of TC,

13 Plaintiffs,

14 vs.

15 CATHOLIC BISHOP OF SPOKANE, a  
16 Corporation Sole, and PATRICK  
17 O'DONNELL, individual,

18 Defendants.  
19

) No. 02-2-05956-7

) DEFENDANT O'DONNELL'S FIRST  
) INTERROGATORIES & REQUEST  
) FOR PRODUCTION TO DEFENDANT  
) CATHOLIC BISHOP OF SPOKANE  
) [AND ANSWERS THERETO]

20 Pursuant to the Washington Civil Rules for Superior Court, defendant O'Donnell  
21 propounds the following interrogatories and requests for production of documents to be answered  
22 by defendant Catholic Bishop of Spokane within 30 days from the date of receipt. With respect  
23 to requests for production, all responsive material should be produced at the offices of Helsell  
Fetterman, LLP at 1325 Fourth Avenue, Ste. 1500, Seattle, Washington 98101.

24 1. Interrogatory No. 1: With respect to all of your insurance coverage including medical and  
liability policies during the past 10 years, state the following:

- 25 (a) The name and address of the insurer(s);  
26 (b) The policy number;  
27 (c) The group and subscriber numbers, if applicable;  
28 (d) The dates of coverage;

DEF O'DONNELL'S 1<sup>ST</sup> INTERROGATORIES &  
REQUESTS FOR PRODUCTION OF DOC'S  
TO CATHOLIC BISHOP OF SPOKANE  
[AND ANSWERS THERETO] - 1

PAINE, HAMBLIN, COFFIN, BROOKE & MILLER LLP  
717 WEST SPRAGUE AVENUE, SUITE 1200  
SPOKANE, WASHINGTON 99201-3505 PHONE (509) 455-6000

COPY

1 (e) The name of each insured.

2 **ANSWER:**

- 3 (a) Catholic Mutual Relief Society of America, 4223 Center St., Omaha,  
4 Nebraska 68105  
5 (b) 8434  
6 (c) Not applicable  
7 (d) February 1, 1993 - February 1, 2003  
8 (e) The Catholic Bishop of Spokane, A Corporation Sole

9 2. **Request For Production No. 1:** Produce a copy of the insurance policy(ies) and all bills,  
10 invoices, and statements relating to medical expenses identified in the preceding interrogatory  
11 answer.

12 **RESPONSE:**

13 Please see attached.

14 **Interrogatory No. 2:** For each insurance agreement under which payments for injuries or  
15 damages have been paid as a result of this incident, state:

- 16 (a) The name of the insurance carrier;  
17 (b) Policy number;  
18 (c) Type of insurance coverage provided;  
19 (d) The named insured;  
20 (e) The amount of money received;  
21 (f) The name, address and phone number of the insurance adjuster handling  
22 the claim.

23 **ANSWER:**

24 No payments for injuries or damages as a result of this incident have been  
25 made through any insurance agreement.

26 **Request For Production No. 2:** Produce a copy of the policy(ies) as referenced in  
27 Interrogatory No. 2.

28 **RESPONSE:**

Please see response to Interrogatory No. 2.

DEF O'DONNELL'S 1<sup>ST</sup> INTERROGATORIES &  
REQUESTS FOR PRODUCTION OF DOC'S  
TO CATHOLIC BISHOP OF SPOKANE  
[AND ANSWERS THERETO] - 2

PAINE, HAMBLIN, COFFIN, BROOKE & MILLER LLP  
717 WEST SPRAGUE AVENUE, SUITE 1200  
SPOKANE, WASHINGTON 99201-3505 PHONE (509) 455-6000

18477-002\DOCS.LA:141113.1

1 **Interrogatory No. 3:** Do you know of any insurance agreement under which any insurer  
2 may be liable to pay part or all of any damages as alleged in this lawsuit? If so, for each such  
3 insurance agreement, state:

- 4 (a) The name of the insured;  
5 (b) The name of the insurer;  
6 (c) The policy number;  
7 (d) The effective date of coverage;  
8 (e) The type of insurance coverage provided;  
9 (f) The dollar limit for each coverage.

10 **ANSWER:**

11 **This defendant's investigation of insurance coverage is ongoing. Based upon**  
12 **information developed to date, coverage has been determined as follows:**

- 13 (a) **Catholic Bishop of Spokane**  
14 (b) **General Insurance Company of America**  
15 (c) **CP317215**  
16 (d) **February 1, 1971 - February 1, 1972**  
17 (e) **Blanket Liability**  
18 (f) **\$200,000 each person / \$2,000,000 each occurrence / aggregate**

- 19 (a) **Catholic Bishop of Spokane**  
20 (b) **Unknown**  
21 (c) **Unknown**  
22 (d) **February 1, 1971 - February 1, 1972**  
23 (e) **Excess Liability**  
24 (f) **\$1,000,000**

- 25 (a) **Catholic Bishop of Spokane**  
26 (b) **Oregon Automobile Insurance Co.**  
27 (c) **CP10500**  
28 (d) **February 1, 1972 - February 1, 1973**  
(e) **Blanket Liability**  
(f) **\$200,000 / \$2,000,000**

- (a) **Catholic Bishop of Spokane**  
(b) **Unknown**  
(c) **Unknown**  
(d) **February 1, 1972 - February 1, 1973**  
(e) **Excess Liability**  
(f) **\$2,000,000**

DEF O'DONNELL'S 1<sup>ST</sup> INTERROGATORIES &  
REQUESTS FOR PRODUCTION OF DOC'S  
TO CATHOLIC BISHOP OF SPOKANE  
[AND ANSWERS THERETO] - 3

*PAINÉ, HAMBLÉN, COFFIN, BROOKE & MILLER LLP*  
717 WEST SPRAGUE AVENUE, SUITE 1200  
SPOKANE, WASHINGTON 99201-3505 PHONE (509) 455-6000



- 1 (a) Catholic Bishop of Spokane  
2 (b) Oregon Automobile Insurance Co.  
3 (c) CP10500  
4 (d) February 1, 1973 - February 1, 1974  
5 (e) Blanket Liability  
6 (f) \$200,000 / \$1,000,000  
7  
8 (a) Catholic Bishop of Spokane  
9 (b) Unknown  
10 (c) Unknown  
11 (d) February 1, 1973 - February 1, 1974  
12 (e) Excess Liability  
13 (f) \$5,000,000  
14  
15 (a) Catholic Bishop of Spokane  
16 (b) Oregon Automobile Insurance Company  
17 (c) CP10500  
18 (d) February 1, 1974 - February 1, 1975  
19 (e) Blanket Liability  
20 (f) \$200,000 / \$1,000,000  
21  
22 (a) Catholic Bishop of Spokane  
23 (b) Unknown  
24 (c) Unknown  
25 (d) February 1, 1974 - February 1, 1975  
26 (e) Excess Liability  
27 (f) \$5,000,000  
28  
29 (a) Catholic Bishop of Spokane  
30 (b) Oregon Automobile Insurance Co.  
31 (c) CP16200  
32 (d) February 1, 1975 - February 1, 1976  
33 (e) Blanket Liability  
34 (f) \$200,000 / \$1,000,000  
35  
36 (a) Catholic Bishop of Spokane  
37 (b) Unknown  
38 (c) Unknown  
39 (d) February 1, 1975 - February 1, 1976  
40 (e) Excess Liability  
41 (f) \$5,000,000

DEF O'DONNELL'S 1<sup>ST</sup> INTERROGATORIES &  
REQUESTS FOR PRODUCTION OF DOC'S  
TO CATHOLIC BISHOP OF SPOKANE  
[AND ANSWERS THERETO] - 4

PAINE, HAMBLIN, COFFIN, BROOKE & MILLER LLP  
717 WEST SPRAGUE AVENUE, SUITE 1200  
SPOKANE, WASHINGTON 99201-3505 PHONE (509) 455-6000

- 1 (a) Catholic Bishop of Spokane  
2 (b) Continental Insurance Co.  
3 (c) CBP907065  
4 (d) February 1, 1976 - February 1, 1977  
5 (e) Blanket Liability  
6 (f) \$300,000 / \$300,000  
7  
8 (a) Catholic Bishop of Spokane  
9 (b) Unknown  
10 (c) Unknown  
11 (d) February 1, 1976 - February 1, 1977  
12 (e) Excess Liability  
13 (f) \$5,000,000  
14  
15 (a) Catholic Bishop of Spokane  
16 (b) Indiana Insurance Co.  
17 (c) 12128239  
18 (d) February 1, 1977 - February 1, 1978  
19 (e) Blanket Liability  
20 (f) \$250,000 / \$500,000  
21  
22 (a) Catholic Bishop of Spokane  
23 (b) Unknown  
24 (c) Unknown  
25 (d) February 1, 1977 - February 1, 1978  
26 (e) Excess Liability  
27 (f) \$2,000,000  
28  
29 (a) Catholic Bishop of Spokane  
30 (b) Indiana Insurance Co.  
31 (c) 12128239  
32 (d) February 1, 1978 - February 1, 1979  
33 (e) Blanket Liability  
34 (f) \$250,000 / \$500,000  
35  
36 (a) Catholic Bishop of Spokane  
37 (b) Unknown  
38 (c) Unknown  
39 (d) February 1, 1978 - February 1, 1979  
40 (e) Excess Liability  
41 (f) \$2,000,000

DEF O'DONNELL'S 1<sup>ST</sup> INTERROGATORIES &  
REQUESTS FOR PRODUCTION OF DOC'S  
TO CATHOLIC BISHOP OF SPOKANE  
[AND ANSWERS THERETO] - 5

PAINE, HAMBLIN, COFFIN, BROOKE & MILLER LLP  
717 WEST SPRAGUE AVENUE, SUITE 1200  
SPOKANE, WASHINGTON 99201-3505 PHONE (509) 455-6000

- 1 (a) Catholic Bishop of Spokane  
2 (b) CNA Insurance Co.  
3 (c) IP4060136  
4 (d) February 1, 1979 - February 1, 1980  
5 (e) Blanket Liability  
6 (f) \$500,000 / \$500,000  
7  
8 (a) Catholic Bishop of Spokane  
9 (b) Unknown  
10 (c) Unknown  
11 (d) February 1, 1979 - February 1, 1980  
12 (e) Excess Liability  
13 (f) \$2,000,000  
14  
15 (a) Catholic Bishop of Spokane  
16 (b) Continental Casualty Co. (CNA)  
17 (c) IP6514553  
18 (d) February 1, 1980 - February 1, 1981  
19 (e) Blanket Liability  
20 (f) \$500,000 / \$500,000  
21  
22 (a) Catholic Bishop of Spokane  
23 (b) Unknown  
24 (c) Unknown  
25 (d) February 1, 1980 - February 1, 1981  
26 (e) Excess Liability  
27 (f) \$2,000,000  
28  
29 (a) Catholic Bishop of Spokane  
30 (b) Aetna Insurance Co.  
31 (c) CPP443395  
32 (d) February 1, 1981 - February 1, 1982  
33 (e) Blanket Liability  
34 (f) \$500,000 / \$500,000  
35  
36 (a) Catholic Bishop of Spokane  
37 (b) Unknown  
38 (c) Unknown  
39 (d) February 1, 1981 - February 1, 1982  
40 (e) Excess Liability  
41 (f) \$5,000,000

DEF O'DONNELL'S 1<sup>ST</sup> INTERROGATORIES &  
REQUESTS FOR PRODUCTION OF DOC'S  
TO CATHOLIC BISHOP OF SPOKANE  
[AND ANSWERS THERETO] - 6

PAINE, HAMBLIN, COFFIN, BROOKE & MILLER LLP  
717 WEST SPRAGUE AVENUE, SUITE 1200  
SPOKANE, WASHINGTON 99201-3505 PHONE (509) 455-6000

- 1 (a) Catholic Bishop of Spokane
- 2 (b) The Home Indemnity Company
- 3 (c) IST-P 192685
- 4 (d) February 1, 1982 - February 1, 1984
- 5 (e) Comprehensive General Liability
- 6 (f) \$500,000 each occurrence / \$500,000 aggregate
- 7
- 8 (a) Catholic Bishop of Spokane
- 9 (b) Mission National Insurance Co.
- 10 (c) MN007465
- 11 (d) February 1, 1982 - February 1, 1984
- 12 (e) Umbrella Excess Liability
- 13 (f) \$15,000,000
- 14
- 15 (a) Catholic Bishop of Spokane
- 16 (b) The Home Indemnity Company
- 17 (c) IST-P 199450
- 18 (d) February 1, 1984 - February 1, 1985
- 19 (e) Comprehensive General Liability
- 20 (f) \$500,000 each occurrence / \$500,000 aggregate
- 21
- 22 (a) Catholic Bishop of Spokane
- 23 (b) Commercial Insurance Company
- 24 (c) CBP905610
- 25 (d) February 1, 1985 - February 1, 1987
- 26 (e) Comprehensive General Liability
- 27 (f) \$1,000,000 each occurrence / \$1,000,000 aggregate
- 28
- 29 (a) Catholic Bishop of Spokane
- 30 (b) Mission National Insurance Co.
- 31 (c) MN043888
- 32 (d) February 1, 1985 - February 1, 1986
- 33 (e) Umbrella Excess Liability
- 34 (f) \$5,000,000
- 35
- 36 (a) Catholic Bishop of Spokane
- 37 (b) National Surety Corp. (Fireman's Fund)
- 38 (c) 0-86-XLX-1735117
- 39 (d) February 1, 1985 - February 1, 1986
- 40 (e) Blanket Excess Liability
- 41 (f) \$10,000,000

DEF O'DONNELL'S 1<sup>ST</sup> INTERROGATORIES &  
REQUESTS FOR PRODUCTION OF DOC'S  
TO CATHOLIC BISHOP OF SPOKANE  
[AND ANSWERS THERETO] - 7

PAINE, HAMBLIN, COFFIN, BROOKE & MILLER LLP  
717 WEST SPRAGUE AVENUE, SUITE 1200  
SPOKANE, WASHINGTON 99201-3505 PHONE (509) 455-6000

- (a) Catholic Bishop of Spokane  
(b) Mission National Insurance Co.  
(c) MA001903  
(d) February 1, 1986 - February 1, 1987  
(e) Umbrella Excess Liability  
(f) \$4,000,000

3. Request For Production No. 3: Produce a copy of the policy(ies) as referenced in Interrogatory No. 3.

**RESPONSE:**

Please see the attached policies and other documentation evidencing insurance coverage.

DATED this 28th day of January, 2003.

HELSELL FETTERMAN LLP

By                     /s/                      
John G. Bergmann, WSBA #386  
Attorneys for Defendant O'Donnell

DEF O'DONNELL'S 1<sup>ST</sup> INTERROGATORIES &  
REQUESTS FOR PRODUCTION OF DOC'S  
TO CATHOLIC BISHOP OF SPOKANE  
[AND ANSWERS THERETO] - 8

*PAINE, HAMBLIN, COFFIN, BROOKE & MILLER LLP*  
717 WEST SPRAGUE AVENUE, SUITE 1200  
SPOKANE, WASHINGTON 99201-3505 PHONE (509) 455-6000

1 CR26(g) CERTIFICATION:

2 Answers dated this 15<sup>th</sup> day of April, 2003.

3  
4 PAINE, HAMBLIN, COFFIN, BROOKE  
& MILLER LLP

5  
6  
7 By: 

8 Gregory J. Arpin, WSBA #2746  
9 Attorneys for Defendant,  
Catholic Bishop of Spokane

10 DECLARATION:

11  
12 I am the representative for the Catholic Bishop of Spokane, and I declare under penalty  
13 of perjury under the laws of the State of Washington that I have read the foregoing answers to  
interrogatories, know the contents thereof and believe the same to be true and correct.

14 SIGNED at Spokane, Washington this 17<sup>th</sup> day of April, 2003.

15  
16   
17 Signature

18 Rev. Steven L. Dublinski

19 Print

20 Vicar General / Moderator of the Curia

21 Title

22  
23  
24  
25 DEF O'DONNELL'S 1<sup>ST</sup> INTERROGATORIES &  
26 REQUESTS FOR PRODUCTION OF DOC'S  
27 TO CATHOLIC BISHOP OF SPOKANE  
28 [AND ANSWERS THERETO] - 9

PAINE, HAMBLIN, COFFIN, BROOKE & MILLER LLP  
717 WEST SPRAGUE AVENUE, SUITE 1200  
SPOKANE, WASHINGTON 99201-3505 PHONE (509) 455-6000

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 17<sup>th</sup> day of April, 2003, I caused to be served a true and correct copy of the foregoing DEFENDANT O'DONNELL'S FIRST INTERROGATORIES & REQUEST FOR PRODUCTION TO DEFENDANT CATHOLIC BISHOP OF SPOKANE [AND ANSWERS THERETO] to the following:

☐ HAND DELIVERY  
☐ U.S. MAIL  
☒ OVERNIGHT MAIL  
☐ VIA FACSIMILE

Michael T. Pfau  
Gordon, Thomas, Honeywell, Malanca,  
Peterson & Daheim LLP  
P.O. Box 1157  
Tacoma, WA 98401-1157

☐ HAND DELIVERY  
☐ U.S. MAIL  
☒ OVERNIGHT MAIL  
☐ VIA FACSIMILE

Timothy D. Kosnoff  
Law Offices of Timothy D. Kosnoff  
800 Bellevue Way N.E., Ste. 300  
Bellevue, WA 98004

☐ HAND DELIVERY  
☐ U.S. MAIL  
☒ OVERNIGHT MAIL  
☐ VIA FACSIMILE

John Gilbert Bergmann  
Helsell Fetterman LLP  
1325 Fourth Ave., Ste. 1500  
P.O. Box 21846  
Seattle, WA 98111-3846

Bruce T. Bennett  
Print Name: Bruce T. Bennett

I:\Spodocs\13066\00010\disc\00099870.WPD

DEF O'DONNELL'S 1<sup>ST</sup> INTERROGATORIES &  
REQUESTS FOR PRODUCTION OF DOC'S  
TO CATHOLIC BISHOP OF SPOKANE  
[AND ANSWERS THERETO] - 10

PAINE, HAMBLIN, COFFIN, BROOKE & MILLER LLP  
717 WEST SPRAGUE AVENUE, SUITE 1200  
SPOKANE, WASHINGTON 99201-3505 PHONE (509) 455-6000

**Defendant O'Donnell's First Interrogatories and  
Requests for Production to Defendant Catholic Bishop of Spokane  
[And Answers Thereto]**

**INDEX OF INSURANCE POLICIES AND/OR  
EVIDENCE OF INSURANCE POLICIES PRODUCED BY  
DEFENDANT CATHOLIC BISHOP OF SPOKANE**

1. **General Insurance Company of America**  
(Safeco) Policy No. CP317215 (2/1/71 - 2/1/72) ..... 0305-0312
2. **Oregon Automobile Insurance Company**  
Policy No. CP10500 (2/1/72 - 2/1/73) ..... 0313-0336
3. **Oregon Automobile Insurance Company**  
Policy No. CP10500 (2/1/73 - 2/1/74) ..... 0337-0344
4. **Oregon Automobile Insurance Company**  
Policy No. CP 10500 (2/1/74 - 2/1/75) ..... 0345-0353
5. **Oregon Automobile Insurance Company**  
Policy No. CP16200 (2/1/75 - 2/1/76) ..... 0354-0368
6. **Continental Insurance Company**  
Policy No. CBP907065 (2/1/76 - 2/1/77) ..... 0369-0380
7. **Indiana Insurance Company**  
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No. 63837-3

SUPREME COURT  
STATE OF WASHINGTON

Frank Munns, Joseph Doetsch, Nadine Gerky,  
Denise O'Bryan, Betty Murray, Margaret Heumphreus,  
and Russell Bergevin,

*Appellants,*

*v.*

Robert C. Martin, Development Services Manager of  
the City of Walla Walla, and City of Walla Walla, a  
Municipal Corporation,

*Respondents,*

*and*

Catholic Bishop of Spokane,

*Respondent.*

BRIEF OF RESPONDENT CATHOLIC BISHOP OF SPOKANE

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CATHOLIC BISHOP OF  
SPOKANE

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